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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 RICARDO SALAS-ROMERO,  
15 Defendant.

Case No. 2:16-cr-164-APG-CWH

**UNOPPOSED MOTION TO  
CONDUCT PRE-PLEA  
PRESENTENCE INVESTIGATION  
REPORT AND ORDER**

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17 Ricardo Salas-Romero, the Defendant in this case, through his attorney, Rene L.  
18 Valladares, Federal Public Defender, and Assistant Federal Public Defender, William Carrico,  
19 file this Motion to the Court to Order that a Presentence Investigation Report be conducted  
20 before a finding of guilt is made. This unopposed motion is made for the following reasons.

21 DATED this 8<sup>th</sup> day of July, 2016.

22 RENE L. VALLADARES  
23 Federal Public Defender

24 By: /s/ William Carrico

25 WILLIAM CARRICO,  
Assistant Federal Public Defender  
26 Attorney for Ricardo Salas-Romero

**UNOPPOSED MOTION FOR PREPARATION OF PRE-PLEA PSI**

Ricardo Salas-Romero was charged by Indictment on May 25, 2016, with one count of Deported Alien Found Unlawfully in the United States. The Parties agree that the case may be appropriate for disposition short of trial, and they agree that having a good understanding of this Defendant's Criminal History is important to a fair disposition of the case. Trial in this matter is set for July 25, 2016.

Despite the best efforts of the Parties, the information available from agency summaries and computer data bases regarding the Defendant's complete Criminal History remains confusing and contradictory. A mistaken calculation could expose the Defendant to enhanced punishment. If not properly counseled, this could result in a plea that is uninformed as to the full consequences. Counsel for the Parties have informally inquired of the Office of U.S. Probation as to whether resources are available for the requested purpose and have been assured that such a request from the Court would not compromise efficiency or divert needed resources. For these reasons, the parties respectfully request that a pre-plea Presentence Investigation Report be conducted in this matter.

DATED this 8<sup>th</sup> day of July, 2016.

Respectfully submitted,  
RENE L. VALLADARES  
Federal Public Defender

By: /s/ William Carrico

WILLIAM CARRICO  
Assistant Federal Public Defender  
Attorney for Ricardo Salas-Romero

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No. 2:16-cr-164-APG-CWH

4 Plaintiff,

**ORDER**

5 v.

6 RICARDO SALAS-ROMERO,

7 Defendant.

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10 The reasons being sound, the Parties being in agreement and the best interests of justice  
11 and judicial economy being served:

12 IT IS HEREBY ORDERED that the United States Probation Office prepare a  
13 Presentence Investigation Report in this case prior to a finding of guilt or entry of plea by the  
14 Defendant named above.

15  
16 DATED this 8<sup>th</sup> day of July, 2016.

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20 UNITED STATES DISTRICT JUDGE